

Filing in opposition to 11306

To the Commission. After reading the pertinent details contained within this notice of proposed rulemaking I have the following comments.

I feel a bandwidth limitation is a very bad thing for Amateur radio. At first it would appear that the ARRL is proposing to open the door to more modes and better utilization of the spectrum. It is just not so. The proposed bandwidth restrictions do not accommodate the existing conditions, such as wideband high fidelity single sideband emission as well as good full fidelity full carrier amplitude modulated emissions. There are individuals who do experiment and use these wideband communications technologies.

There will be the old question what really defines communications quality audio? There should be no limits placed on the level of improvement of the audio quality by regulation. Amateur radio as much as it is an emergency communications service is also a technical service. There should be as few restrictions as possible.

One thing the proposal does not address is, that, if implemented, would eliminate the use of narrow band frequency modulation on all amateur bands below 29MHz. As it is we can operate narrowband FM on the HF spectrum. Although narrow band FM on the HF spectrum is not used much, the provision to use it should be retained.

If we look at other radio services other than Amateur radio, we see that they are all channelized services. These services such as broadcasting, Business, public safety, etc., services are all channelized. In this case there has to be bandwidth limits depending on channel spacing and type of modulation. The amateur radio services encompass many different types of modes of operation. The amateur radio service is the only service that does not have channels except for the recent 60 meter band. In this case they are bandwidth restricted to 2.8 KHz and limited to only upper sideband transmission. All of the other Amateur assignments do not have any specific channels. It is up to the operator to pick and choose his operating frequency.

It is also the operator's responsibility to make his best effort to minimize interference by changing frequency if he is too near to another communication taking place. In my experience most operators are accommodating in working interference problems out. In studying the document it can get confusing as to what is permitted where without a copy of the bandwidth chart posted by the operating position. Trying to police the situation to make sure that everybody is complying will be a logistical nightmare.

Precise bandwidth measurement requires expensive equipment and the proper understanding of

what's being measured. In short , RM-11306 is a very bad idea . It is not good for Amateur radio.

To simplify things I propose the following Elimination of ALL so called CW and radiotelephone subbands. Amateur radio bands in most other countries do not have mode dependent subbands. The 160 meter amateur band does not have any mode dependent subbands. There are no problems either. The solution is very simple. Define only two emission types, Analogue modes and Digital modes. Why complicate things. There should only be two classes of modes . How simple can you get? In portions designated as digital modes one could also operate analogue modes but accept interference from any broadband digital emission within that subband portion. Surely there is enough spectrum for 50-100 Khz for a digital mode only subband in each amateur band below 29.7 Mhz. This would allow for the development and deployment of a number of spread spectrum and high rate digital transmission methods.

Intermixing both analogue and digital modes over the whole width of an amateur band will have detrimental effects on those using analogue modes. Therefore there will have to be a digital emission subband to limit interference potential to analogue mode users. As time passes and newer and technologies emerge then it may be time to eliminate all subbands. Full access to each Amateur band should class of license dependent .

For example an Extra Class licensee may make use any analogue mode in the 3.5-4.0 Mhz band .A General class licensee would have portions of that spectrum unavailable to him as it is today. If the Technician class licensee is permitted access to the HF spectrum , assign a portion such as 3.9-4.0 Mhz-7.250-7.300 etc. with some digital mode subband privileges. Deciding which portion of each band becomes a digital subband should be done in a manner to have the least impact on current operations.

In reading the other proposal, RM-11305 I feel this makes the most sense for the future of Amateur radio.

About myself. I have been involved with Amateur radio for 39 years. I was licensed as a Novice class in Feb of 1967. I currently hold an Advanced class license as WA1HLR. Through amateur radio I learned radio theory and practice . I used the knowledge and experience gained to pass the First Class radiotelephone operators License in 1970. I have worked in the broadcast engineering field and other related RF engineering since then.

Comments respectivley submitted,

Timothy M Smith
Licensee WA1HLR

